

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 5:25-cv-00462-G
)	
PLAZA HOTELS, LLC; STEVE)	
KETTER; MICHAEL WILEY; OKC)	
AIRPORT ES, LLC; ESH STRATEGIES)	
FRANCHISE, LLC; KAJAL)	
HOSPITALITY, INC; JALIYAN)	
HOSPITALITY, INC; SUPER 8)	
WORLDWDE, INC; RAJ KRUPA)	
HOTEL, LLC; DAYS INNS)	
WORLDWIDE, INC; CHAND & SAAJ)	
HOSPITALITY, INC; RAMADA)	
WORLDWIDE, INC; YASH)	
ENTERPRISES, INC; HOWARD)	
JOHNSON INTERNATIONAL, INC;)	
NOOR HOTEL, LLC; AMBICA, LLC;)	
OM, LLC; INDRA, LLC; AND G6)	
HOSPITALITY FRANCHISING, LLC,)	
)	
Defendants.)	

**NOTICE OF NON-OPPOSITION TO PLAINTIFF’S REQUEST FOR LEAVE TO
AMEND HER COMPLAINT**

COME NOW, Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., Howard Johnson International, Inc. (collectively, the “Wyndham Franchisor Defendants”), and ESH Strategies Franchise, LLC (“ESH Strategies,” and together with the Wyndham Franchisor Defendants, the “Moving Defendants”) and give

notice to the Court that Moving Defendants do not oppose Plaintiff's request for leave to amend her complaint, as proposed in Doc. 58.¹

Dated: June 6, 2025

Respectfully submitted,

DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.

s/ Kaylee P. Davis-Maddy

Michael S. Linscott, OBA No. 17266
700 Williams Center Tower II
Two West Second Street
Tulsa, Oklahoma 74103-3522
Telephone 918-582-1211
Facsimile 918-591-5360
mlinscott@dsda.com

Kaylee Davis-Maddy, OBA No. 31534
210 Park Avenue, Suite 1200
Oklahoma City, OK 73102
Telephone (405) 319-3513
Facsimile (405) 319-3524
kmaddy@dsda.com

DLA PIPER LLP (US)

Mallory Biblo (*pro hac vice*)
1900 N. Pearl St., Suite 2200
Dallas, Texas 75201
Telephone: (214) 743-4500
Facsimile: (214) 743-4545
mallory.biblo@us.dlapiper.com

¹ Notwithstanding this Notice of Non-Opposition related to Plaintiff's request for leave to amend her complaint, Moving Defendants do not intend to waive any other procedural or other defenses available to them and expressly reserve the right subsequently raise any such defenses, including any available jurisdictional, procedural, and/or substantive defenses existing under the Federal Rules of Civil Procedure or applicable law.

David S. Sager (*pro hac vice*)
51 John F. Kennedy Parkway, Suite 120
Short Hills, New Jersey 07078
Telephone: (973) 520-2570
Facsimile: (973) 520-2551
david.sager@us.dlapiper.com

*Attorneys for Super 8 Worldwide, Inc., Days
Inns Worldwide, Inc., Ramada Worldwide, Inc.,
and Howard Johnson International, Inc.*

STEIDLEY & NEAL, P.L.L.C.

s/ Charles D. Neal, Jr.

Charles D. Neal, Jr., OBA #6591

cdn@steidley-neal.com

Philard L. Rounds, Jr., OBA #7780

plr@steidley-neal.com

Jamie A. Rogers, OBA #19927

jar@steidley-neal.com

CityPlex Towers, 53rd Floor

2448 East 81st Street

Tulsa, Oklahoma 74137

(918) 664-4612 telephone

(918) 664-4133 facsimile

And

**WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL**

Patrick B. Moore

(*Pro Hac Vice*)

Georgia Bar No. 520390

Shubhra R. Mashelkar

Georgia Bar No. 475388

(*Pro Hac Vice*)

Michael W. Warner

Georgia Bar No. 751362

(*Pro Hac Vice*)

Christopher T. Byrd

(Pro Hac Vice)
Georgia Bar No. 100854
3344 Peachtree Rd. NE, Suite 2400
Atlanta, Georgia 30326
404-876-2700 | 404-875-9433 (fax)
PMoore@wwhgd.com
SMashelkar@wwhgd.com
Mwarner@wwhgd.com
Cbyrd@wwhgd.com
Attorneys for ESH Strategies Franchise, LLC

CERTIFICATE OF SERVICE

I hereby certify that, on June 6, 2025, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system, electronic mail to:

Alexander S. Gebert alex.gebert@fmglaw.com
David C. Senger david@cswlawgroup.com
Eric A. Moen eamoen@chubbucklaw.com
Fletcher D. Handley, Jr. fdh@handleylaw.com
Hunter M. Siex hunter@cswlawgroup.com
Robert Glenn Chadwick, Jr. bob.chadwick@fmglaw.com
Charles D. Neal, Jr. cdn@steidley-neal.com
Philard L. Rounds, Jr. plr@steidley-neal.com
Jamie A. Rogers jar@steidley-neal.com
Michael C. Kane mike@the702firm.com
Geoffrey C. Parker gparker@hiltonparker.com
Patrick B. Moore pmoore@wwhgd.com
Shubhra R. Mashelkar smashelkar@wwhgd.com
Emma C. Kincade ekincade@secresthill.com
Justin L. Hall jhall@secresthill.com
James K. Secrest, III jsecrest3@secresthill.com
Christopher T. Byrd cbyrd@wwhgd.com
Daniel J. Thompson dthompson@wsolaw.net
Emily N. Richard erichard@wsolaw.net

and by U.S. Mail, postage prepaid to:

Plaza Hotels LLC
c/o Steve Ketter
5101 S. Choctaw Ave
El Reno, OK 73036

Kajal Hospitality, LLC
c/o Jaydip Modi
1120 S 10th St.
Clinton, OK 73601

Steve Ketter
5101 S. Choctaw Ave.
El Reno, OK 73036

Noor Hotel LLC
c/o Abdel Jawabreh
3213 Meadow Lane
Edmond, OK 73013

OM LLC
c/o Ramesh Patel
12001 N I-35 Service Rd
Oklahoma City, OK, 73131

Jonathan Wilfong
Oyo Hotels, Inc.
440 Louisiana Street, Suite 1050
Houston, TX 77002
Attorney for G6 Hospitality Franchising, LLC

Bart Jay Robey
Abby R. Herren
CHUBBUCK DUNCAN & ROBEY, P.C.
1329 Classen Drive
Oklahoma City, OK 73103
*Attorneys for Defendant OKC Airport
ES, LLC*

Michael Wiley
11025 N. County Line Rd
Yukon, OK 73099

Yash Enterprises, Inc.
c/o Tushar Natha
400 S. Meridian
Oklahoma City, OK 73108

Ambica, LLC
c/o Ramesh Patel
12001 N. I-35 Service Rd.
Oklahoma City, OK 73131

Indra LLC
c/o Ramesh Patel
11935 N. I-35 Service Rd.
Oklahoma City, OK, 73131

s/ Kaylee P. Davis-Maddy